

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

BOBBY MORRIS, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

NRRM, LLC d/b/a CarShield

Defendant.

Case No. 4:25-cv-00441

JURY TRIAL DEMANDED

DECLARATION OF BOBBY MORRIS

1. My name is Bobby Morris. I am over 18 years old. I can testify competently to the undersigned statements.

2. This Declaration is being made under the penalty of perjury pursuant to 28 U.S.C. § 1746.

3. I make this Declaration in opposition to the Defendant's motion to dismiss.

4. My telephone number 636-XXX-XXXX is on the National Do-Not-Call Registry.

5. I am the user of 636-XXX-XXXX.

6. The 636-XXX-XXXX number is registered in my name and I am the subscriber of record.

7. This number is used for personal, family, and household purposes.

8. I have never submitted my telephone number to Defendant to receive calls.

9. I never visited CarShield's website or any affiliated website and never submitted any of my personal information or telephone number to CarShield or any related entity.

10. Indeed, the information that CarShield has for my vehicle is simply incorrect biographical information about the car; the mileage is completely inaccurate, as is its condition.

11. I never requested to be contacted by CarShield or anyone on its behalf, and I never gave prior express written consent to receive any telemarketing calls from them.

12. I have never had any prior relationship, contractual, business, or otherwise, with CarShield.

13. The IP address fde4:8dba:2000:1ee1:6b20:100:a6e:4 is not and has never been my IP address.

14. I further understand that my attorneys have analyzed the IP address and determined that it is an IP address in CarShield's internal network.

15. It is also my understanding that, based on publicly available standards (RFC 4193), that IP address is a Unique Local IPv6 Address (ULA), which cannot be routed on the internet and is limited to private, internal use.

16. I have never accessed CarShield's internal network or submitted information from an IP address that would be used by CarShield, and have no ability to access CarShield's internal systems or internal IP addresses.

17. Thus, the claimed consent originated internally from CarShield, not from me.

18. CarShield placed multiple calls to me within the span of a single hour.

19. I attempted to call the number back to ascertain who it was that was calling me and was precluded from making a do-not-call request, including because in one instance I

simultaneously received a call from CarShield and because I would never get connected to someone; the call would simply disconnect and I was hung up on.

20. During one of the calls I answered, I engaged with the caller only for the purpose of identifying who was calling me so that I could stop the calls and pursue legal action.

21. I did not engage with the caller or confirm the information because I wanted to receive the call or was interested in their product or service; rather, in my experience, simply confirming the information the caller has is the easiest way to identify the caller.

22. These calls were unwanted, intrusive, and disturbed my privacy and domestic peace.

23. In fact, CarShield precluded me from calling the number back to lodge a do not call request and later blocked my number.

24. I therefore sent a letter seeking to ascertain why I was receiving calls, but instead received the vituperative response reproduced in my Complaint.

25. As such, I never consented to receive the subject calls which are the basis for my complaint.

26. I do not want such calls.

27. To be clear, I do nothing to precipitate the illegal messages which are placed to me. I do not want these communications, but they continue to be placed to me. They are highly annoying and disruptive and are especially problematic after you ask them to stop but you are not able to get them to stop.

28. My number is on the Do-Not-Call Registry, and I did not provide any consent for anyone to send the calls at issue to me.

29. I was deprived of the ability to make a proper internal Do Not Call request due to CarShield's failure to connect me to a live agent or provide a working opt-out process.

30. I had no ability to revoke consent that I never gave and was not provided a meaningful opportunity to stop the calls.

31. To the best of my recollection, I further attempted to ask that the calls stop on at least one of the calls, but the recordings presented do not appear to be complete records of the calls, C calls appear to have been disconnected before I made such request.

32. I do not and have never welcomed nor wanted illegal calls and do nothing to receive or deserve them. My injury was done completely at the hands of Defendant, who took it upon itself to send me multiple calls in violation of the TCPA, including after I attempted to get them to stop.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21st day of July 2025, in the United States of America,

Bobby Morris
Bobby Morris (Jul 20, 2025 20:15 CDT)

Bobby Morris